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December 21, 2021

Via ECF and Email

Hon. Valerie E. Caproni
United States District Judge
40 Foley Square
New York, New York 10007

Re: United States v. Bolivar Baez, 21 Cr. 637 (VEC)

Dear Judge Caproni:

I was appointed to represent Bolivar Baez in the above-referenced matter. I write without objection from the Government to request a modification to Mr. Baez's bail conditions.

By way of background, on August 19, 2021, Mr. Baez was arraigned on a complaint which charged him with a violation of 21 U.S.C. § 846. At his arraignment, Magistrate Judge Cave fixed Mr. Baez's bail principally in the amount to a \$50,000 PRB to be signed by two financially responsible persons, home detention (with permission to work) with electronic monitoring, travel restricted to the SDNY, EDNY and the District of New Jersey, surrender of travel documents and pretrial supervision. By Order dated November 19, 2021, the Court modified Mr. Baez's bail conditions to allow him to spend Thanksgiving at the apartment of his mother and to go to the gym between 5:00 p.m. to 7:00 p.m. each day. All conditions of bail have been satisfied and Mr. Baez has been compliant with all conditions.

The bail modification sought herein is as follows:

On Christmas Day, December 25, 2021, Mr. Bolivar Baez would like to spend the afternoon and evening with his fiancé's family at 2733 Sedgwick Avenue, Apt. 1B, Bronx, NY. He requests permission to leave his home at 1:00 p.m. on Christmas Day and return to his home by 1:00 a.m. on December 26, 2021.

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I have not yet heard back from pretrial officer Jonathan Lettieri regarding this request. However, I assume that Pretrial's position, as it has been in the past, is that as a policy it opposes bail modifications which seek modifications for "social" purposes, which this is. I have communicated with AUSA Kevin Mead regarding this request and AUSA Mead advised me that the Government does not object to this request.

Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/

John F. Kaley

cc. AUSA Kevin Mead (via email)
Pretrial Services Officer Jonathan Lettieri

Application GRANTED. Mr. Bolivar Baez's bail conditions are modified as follows:

1. On December 25, 2021, from 1:00 p.m. until 1:00 a.m. on December 26, 2021, Mr. Baez may visit his fiance's family at 2733 Sedgwick Avenue, Apt. 1B, Bronx, NY.

SO ORDERED.



12/21/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE